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*Attorney for the Plaintiff, proposed FLSA Collective and potential Rule 23 Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JIAN WU,  
*on his own behalf and on behalf of others similarly situated*

Plaintiff,  
v.

SUSHI NOMADO OF MANHATTAN, INC.  
d/b/a Nomado 33;  
SUSHI PARA 33 CORPORATION  
d/b/a Nomado 33; and  
SUSHI PARA MANHATTAN, CORP.  
d/b/a Sushi Para d/b/a Sushi Para (14th Street)  
d/b/a Sushi Para (Third Avenue)  
d/b/a Sushi Para 88 and;  
WEI LOONG CHAN,  
WENWU CHEN,  
ZHOULIN,  
SHENG R DONG, and  
DING FENG ZHANG

Defendants.

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**Case No. 17-cv-04661**

**29 U.S.C. § 216(b)**  
**COLLECTIVE ACTION &**  
**FED. R. CIV. P. 23 CLASS**  
**ACTION**

**NOTICE OF PLAINTIFF'S  
MOTION FOR  
CONDITIONAL  
COLLECTIVE  
CERTIFICATION**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of John Troy, sworn to on August 1, 2018, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court, at the United States Courthouse for the Southern District of New York, before the Honorable DEBRA FREEMAN for an Order:

(1) granting collective action status, under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b);

(2) ordering the Defendants to produce a Microsoft Excel data file containing contact information, including but not limited to first and last name of the employee, the last known

mailing addresses (including apartment number if applicable), last known telephone numbers, last known email addresses, work locations, position and dates of employment for all those individuals who have worked for the Defendants as a non-managerial employee between June 20, 2014 and the date this Court decides this Motion;

(3) authorizing that notice of this matter be sent to members of the putative class;

(4) authorizing equitable tolling of the statute of limitation pending the expiration of the opt-in period; and

(5) ordering the Defendants to post the approved Proposed Notice in conspicuous locations at the location where the Prospective Collective Action Members worked or are now working;

(6) ordering the Plaintiffs to publish the Notice of Pendency, in an abbreviated form to be approved by the Court, at Defendants' expense should Defendants fail to furnish a complete Excel list or more than 20% of the Notice be returned as undeliverable with no forwarding address to be published in English, Chinese, Indonesian/Malay and Spanish Languages.

Dated: Flushing, New York

August 1, 2018

TROY LAW, PLLC  
*Attorneys for the Plaintiff, proposed FLSA  
Collective and potential Rule 23 Class*

/s/ John Troy  
John Troy (JT0481)